

REMARKS

By this amendment, Applicants have amended claims 1, 4, 9, 17, and 20 and cancelled claims 3, 11, and 19. As a result, claims 1, 4-9, 12-17, and 20 are pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

Claims 9 and 11-16 are rejected under 35 U.S.C. 101 because the claimed invention is allegedly directed to non-statutory subject matter. Applicants have amended claim 9 to include "non-transitory." Applicants note that in amending independent claim 9 to include the term "non-transitory", Applicants understand that a "non-transitory computer readable medium" includes both volatile and non-volatile memory, including but not limited to random access memory (RAM). Accordingly, Applicants assert that claim 9 is directed towards statutory subject matter and respectfully request that the Office withdraw this rejection.

Claims 1, 3-9, 11-17, 19 and 20 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,901,399, Corston et al. (Corston). In order to maintain a proper rejection under 35 U.S.C. § 102, the Office must show that a single reference discloses each feature of the claimed invention. In particular, the Office must show that "[t]he identical invention... [is] shown in as complete detail as is contained in the... claim" to maintain a rejection under 35 U.S.C. § 102. See, e.g.,

MPEP § 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). To this extent, as recently reiterated by the Federal Circuit, in order to anticipate the claimed inventions, the reference must "disclose[] within the four corners of the document not only all of the limitations claimed but also all of the limitations arranged or combined in the same way as recited in the claim." *Net MoneyIN, Inc. v. VeriSign, Inc.*, No. 2007-1565, pp. 17-18 (Fed. Cir. 2008). Applicants respectfully submit that the Office fails to present such a showing.

For example, with respect to claim 1, Applicants respectfully submit that the Office fails, *inter alia*, to show that Corston discloses "a semantic dictionary stored on the at least one computing device, the semantic dictionary including a table that maps user query terms to semantic node terms in the semantic taxonomy; and a relevant document finder stored on the least one computing device, which, only in response to a mapping, based on the semantic dictionary, between a keyword query term in a users keyword query entry with a semantic node term, automatically, without user intervention, enhances the users keyword query entry with the semantic node term" as claimed therein. Applicants contend that Corston fails to disclose a semantic dictionary, or a mapping of user query terms to semantic node terms in the semantic taxonomy. Further, Applicants contend that Corston fails to disclose enhancing a user keyword query entry only in response to a mapping between the keyword query term in the users keyword query entry with a semantic node term.

In light of the above, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 4-8, which depend therefrom, as allegedly being disclosed by Corston.

With respect to claim 9, Applicants submit that the Office fails, *inter alia*, to show that Corston discloses a computer program comprising program code embodied in at least one non-transitory computer-readable storage medium, which when executed, enables a computer system to implement a method of automatically providing expanded keyword searches to increase the scope of keyword searches that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Corston above, Applicants submit that Corston fails to disclose the computer program of claim 9, including “creating a table that maps user query terms to semantic node terms in the semantic taxonomy for a semantic dictionary; and automatically, without user intervention, and only in response to a mapping, based on the semantic dictionary, between a keyword query term in a users keyword query entry with a semantic node term, enhancing the users keyword query to create an enhanced keyword query” as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 9 and claims 10-16, which depend therefrom, as allegedly being anticipated by Corston.

With respect to claim 17, Applicants submit that the Office fails, *inter alia*, to show that Corston discloses a method for a computer search system to interrogate a database that automatically provides expanded keyword search queries that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of Corston above, Applicants submit that Corston fails to disclose the method of claim 17, including “creating a table that maps user query terms to semantic node terms in the semantic taxonomy for a semantic dictionary; and providing a relevant document finder on the at least one computing device, which, only in response to a

mapping, based on the semantic dictionary, between a keyword query term in a users keyword query entry with a semantic node term, automatically, without user intervention, enhances the users keyword query entry with the semantic node term" as claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 17 and claims 20, which depend therefrom, as allegedly being anticipated by Corston.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully request withdrawal of all pending rejections of the claims. Should the Examiner require anything further to place the application in condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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